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7 **UNITED STATES DISTRICT COURT**
8 **NORTHERN DISTRICT OF CALIFORNIA**
9 **SAN FRANCISCO DIVISION**
10

11 WAYMO, LLC,

12 Plaintiff,

13 vs.

14 UBER TECHNOLOGIES, INC;
15 OTTOMOTTO LLC; and OTTO TRUCKING
LLC,

16 Defendants.
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Case No.: 3:17-CV-00939 (WHA)

**NONPARTY LIOR RON'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL PURSUANT TO CIVIL
L.R. 7-11 AND 79-5**

Honorable William Alsup

Pursuant to Civil Local Rules 7-11 and 79-5, Nonparty Lior Ron (“Nonparty” or “Ron”) by and through their counsel of record, respectfully submits this Administrative Motion for a Sealing Order (“Motion to Seal”) permitting Nonparty to file under seal selected portions of Ron’s Opposition to Waymo LLC’s Letter Brief re: Diligenced Employees’ Attorney-Client Privilege in Materials Provided to Stroz Friedberg (“Opposition”).

This Motion to Seal is supported by the Declaration of Jonathan A. Patchen filed concurrently with this Motion to Seal. *See* Civil L.R. 79-5(d)(1)(A) (stating that an administrative motion to seal must be accompanied by a declaration “establishing that the document sought to be filed under seal . . . [is] sealable.”).

Civil Local Rule 79-5(b) states that a document may only be filed under seal “pursuant to a court order that authorizes the sealing of the particular document” and requires the party seeking to file a document under seal to show that the document contains information that is “privileged, protectable as a trade secret or otherwise entitled to protection under the law.” Civil L.R. 79-5(b). “The request must be narrowly tailored to seek sealing only of sealable material, and must conform with Civil L.R. 79-5(d).” *Id.*

Mr. Ron’s Opposition contains information that has been designated “Confidential” and/or “Highly Confidential” by Defendants, Anthony Levandowski, or third-parties to this action. *See* Declaration of Jonathan A. Patchen ¶ 3; Civil L.R. 79-5(e). Pursuant to Civil Local Rule 79-5(d) and (e), Mr. Ron hereby move this Court for an order sealing the following portions of his Opposition:

<u>DOCUMENT/REFERENCES TO BE SEALED</u>	<u>PORTION(S) TO BE SEALED</u>	<u>DESIGNATING PARTY</u>
Ron’s Opposition at pp. 2, 4, 5, and 6	Highlighted in yellow	Defendants and/or Anthony Levandowski and/or other third-parties

Under Civil Local Rule 79-5(d), Mr. Ron has filed concurrently with this Motion to Seal redacted and unredacted versions of his Opposition.

1 **CONCLUSION**

2 For the foregoing reasons, Nonparty Lior Ron respectfully requests that the referenced
3 unredacted version of his Opposition be lodged and filed under seal in this action.

4 Dated: September 25, 2017

Respectfully submitted,

6 TAYLOR & PATCHEN, LLP

9 By: /s/ Jonathan A. Patchen

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